

HEATHER E. WILLIAMS, #122664  
Federal Defender  
LINDA C. HARTER, #179741  
Assistant Federal Defender  
Designated Counsel for Service  
801 "I" Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
P: 916-498-5700/F: 916-498-5710  
[Linda\\_Harter@fd.org](mailto:Linda_Harter@fd.org)

Attorney for Defendant  
MICHELINE RENEE GAGNON-TIPTON

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	NO. 2:22-cr-00220-KJN
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>CONTINUE STATUS CONFERENCE</b>
v.	)	<b>AND EXCLUDE TIME</b>
	)	
MICHELINE RENEE GAGNON-TIPTON,	)	
	)	DATE: February 15, 2023
Defendant.	)	TIME: 9:00 AM
	)	JUDGE: KENDALL J. NEWMAN

IT IS HEREBY STIPULATED between the parties through their respective counsel, Assistant United States Attorney Heiko Coppola, Etan Zaitzu attorney for defendant, Jeffery Alan Wasson and Assistant Federal Defender Linda C. Allison attorney for defendant, Micheline Renee Gagnon-Tipton, that the status conference currently set for February 15, 2023 be continued to March 15, 2023 at 9:00 a.m. and to exclude time under the Speedy Trial Act.

Defense counsel requests additional time for further investigation, to review of discovery, and otherwise prepare for trial.

The parties agree that the ends of justice served by granting defendant's request for a continuance outweighs the best interest of the public and the defendant in a speedy trial.

1           Additionally, the parties stipulate that for the purpose of computing time under the  
2 Speedy Trial Act, the Court should exclude time from February 15, 2023 through March 15,  
3 2023, for defense preparation and investigation pursuant to 18 U.S.C. § 3161(h)(7)(A) and  
4 (B)(iv) [reasonable time to prepare] (Local Code T4).

5  
6 Dated: February 10, 2023

Respectfully submitted,

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8 HEATHER E. WILLIAMS  
Federal Defender

9 /s/ Linda C. Allison  
10 LINDA C. ALLISON  
Assistant Federal Defender  
11 Attorney for Defendant  
MICHELINE RENEE GAGNON-TIPTON

12  
13 Dated: February 10, 2023

/s/ Etan Zaitso  
14 ETAN ZAITSU  
Attorney for JEFFERY ALAN WASSON

15 Dated: February 10, 2023

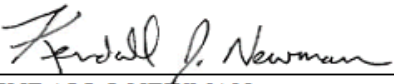
PHILLIP A. TALBERT  
United States Attorney

16  
17 /s/ Heiko Coppola  
HEIKO COPPOLA  
18 Assistant United States Attorney  
Attorney for Plaintiff  
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**ORDER**

The Court orders that the time between February 15, 2023, up to and including March 15, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv) and Local Code T-4 [reasonable time for counsel to prepare]. It is further ordered that the February 15, 2023 status conference shall be continued until March 15, 2023 at 9:00 a.m.

Dated: February 13, 2023

  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE